

BCB CHEYENNE LLC d/b/a BISON )  
BLOCKCHAIN, a Wyoming limited liability )  
Company, )  
)  
Plaintiff, )  
)  
v. ) Civil No. 23-CV-79  
)  
MINEONE WYOMING DATA CENTER, )  
LLC, a Delaware limited liability company; )  
MINEONE PARTNERS LLC, a Delaware )  
limited liability company; TERRA CRYPTO )  
INC., a Delaware corporation; BIT ORIGIN, )  
LTD, a Cayman Island Company; )  
SONICHASH LLC, a Delaware limited )  
liability company; BITMAIN )  
TECHNOLOGIES HOLDING COMPANY, )  
A Cayman Island Company; BITMAIN )  
TECHNOLOGIES GEORGIA LIMITED, )  
a Georgia corporation; and JOHN DOES 1-18, )  
related persons and companies who control )  
or direct some or all of the named Defendants, )  
)  
Defendants. )

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to grant BCB leave to file an over-length Response Brief of fifteen (15) pages for BCB's [proposed] Response in opposition to the MineOne Defendants' 7/8/24 *Motion, Pursuant to Wyoming Statute § 1-15-204 (sic), for Hearing on Their Objections to the Amount of the Prejudgment Attachment Bond Set in the Court's June 28, 2024 Order ("Bond Objections")* [ECF 267]. In support of this Motion, BCB shows the Court as follows:

1. On July 8, 2024, the MineOne Defendants filed their *Bond Objections*. Their *Bond Objections* had five (5) exhibits totaling 72 pages. The thrust of MineOne's *Bond Objections* is to ask the Court to increase the \$100,000 surety bond to either \$22,939,679.68 or \$76,000,000. [ECF 267 at Page 10 of 13]. The effect of such a request, if granted, is that BCB would never be able to purchase such a bond, and the prejudgment attachment and garnishment Writs could never be issued.

2. To properly assert its many objections to the MineOne Defendants' *Bond Objections*, BCB's counsel, Patrick Murphy, needed fifteen (15) pages of briefing, not the allowed ten (10) pages for a non-dispositive motion.

3. Mr. Murphy met and conferred with counsel for the MineOne Defendants about BCB's Request for a [proposed] 15-page over-length Response on Monday morning, July 22, 2024, via email. Counsel for BCB and MineOne, Patrick Murphy and Paula Colbath, respectively, have conferred and they agree that BCB may be allowed fifteen (15) pages for its Response to MineOne's *Bond Objections* and the MineOne Defendants may be allowed fifteen (15) pages for their July 25, 2024 Response Brief to BCB's July 10, 2024 *Motion for Sanctions*.

4. Judicial efficiency and understanding are best served by allowing BCB to file its requested 15-page Response Brief.

5. A proposed Order granting BCB leave to file a 15-page [over-length] Response Brief is submitted with this Motion for the Court's consideration.

WHEREFORE, Plaintiff BCB Cheyenne LLC d/b/a Bison Blockchain respectfully asks the Court to allow BCB to file its 15-page Response Brief in opposition to MineOne Defendants' 7/8/24 Motion, Pursuant to Wyoming Statute § 1-15-204 (sic), for Hearing on Their Objections to the Amount of the Prejudgment Attachment Bond Set in the Court's June 28, 2024 Order ("Bond Objections").

DATED this 22<sup>nd</sup> day of July, 2024.

BCB CHEYENNE LLC d/b/a  
BISON BLOCKCHAIN, Plaintiff

By: /s/ Patrick J. Murphy  
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### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 22<sup>nd</sup> day of July, 2024.

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/s/ Patrick J. Murphy

Patrick J. Murphy